# BOEHM, KURTZ & LOWKY

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#### VIA OVERNIGHT MAIL

April 25, 2007

Beth A. O'Donnell, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re:

Case No. 2007-00134

Dear Ms. O'Donnell:

Please find enclosed the original and twelve copies each of the Petition to Intervene of the Kentucky Industrial Utility Customers, Inc. in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document of file.

Very Truly Yours,

David F. Boehm, Esq.

**BOEHM, KURTZ & LOWRY** 

MLKkew Attachment

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 25<sup>th</sup> day of April, 2007.

Honorable Lindsey W Ingram, III Stoll Keenon Ogden PLLC 300 West Vine Street, Suite 2100 Lexington, KY 40507-1801

Lawrence W. Cook Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204

David F. Boehm

### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

Application Of Kentucky American For	:	Case No. 2007-0013
Certificate Of Convenience And Necessity	:	

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**PUBLIC SERVICE** COMMISSION

## PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Kentucky Industrial Utility Customers, Inc. ("KIUC") requests that it be granted full intervenor status in the abovecaptioned proceeding and states in support thereof as follows:

- KIUC is an association of the largest industrials on the Kentucky-American Water 1. system. Most of the water use of these industrials is for process use in manufacturing their products. The subject of the within investigation concerns the cost and reliability of intervenor's long-term supply of water, which is of the gravest concern. No other intervenor can represent the interests of this unique class of customers.
- 2. The members of KIUC who will participate herein are: Toyota Motor Manufacturing Company, Square D. Company and Lexmark International. KIUC will supplement its Petition with the names of additional participating members as this information becomes known.
- The attorneys for KIUC authorized to represent them in this proceeding and to take 3. service of all documents are:

David F. Boehm, Esq. Michael L. Kurtz, Esq. **BOEHM, KURTZ & LOWRY** 

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WHEREFORE, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

David F. Boehm, Esq.

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COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

April 25, 2007